

## UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

Mahad S. Jama

Case No. 2:23-mj-254

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 4, 2023 in the county of Franklin in the  
Southern District of Ohio, the defendant(s) violated:

Code Section

18 U.S.C. § 2114(a)

Offense Description

-Aggravated Robbery of Mail, Money, or Other Property of the United States

This criminal complaint is based on these facts:

See Affidavit in Support of Criminal Complaint, incorporated here by reference.

☒ Continued on the attached sheet.

Complainant's signature

Mark V. Massaro, United States Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date: April 13, 2023City and state: Columbus, Ohio  
Kimberly A. Tolson

United States Magistrate Judge



**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**MAHAD S. JAMA,**

**Defendant.**

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Mark V. Massaro, being duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a United States Postal Inspector, having been so employed since August 2013. I am presently assigned to the Columbus, Ohio Field Office, Pittsburgh Division of the United States Postal Inspection Service (USPIS).

2. I have gained experience through completion of the Basic Inspector Training (BIT) in November 2013. During BIT training, I was instructed in all phases of criminal investigation, such as criminal law, search and seizure, field enforcement techniques, firearms proficiency, drug and narcotics identification, drug and narcotics field testing, interviewing, and evidence collection. Since August 2013, I have worked with various federal, state, and local law enforcement agencies in the investigation of crimes involving the U.S. Mail and the U.S. Postal Service, including but not limited to mail fraud, bank fraud, mail theft, burglaries, robberies, homicides, dangerous mail investigations, and mailed narcotics.

3. As a federal agent, I am authorized to investigate violations of federal laws and am empowered to execute warrants issued under the authority of the United States.

4. The facts contained in this affidavit are based on my personal knowledge as well as that of the other agents involved in this investigation. All observations that were not made personally by me were related to me by persons with knowledge of this investigation. I submit that this affidavit contains the information necessary to establish probable cause to support the criminal complaint. This affidavit is not intended to include each and every fact and matter observed by or made known to agents of the government. This affidavit is intended to show merely that there is sufficient probable cause for the criminal complaint and does not set forth all of my knowledge about this matter.

5. I make this affidavit in support of a criminal complaint charging Mahad S. Jama with Aggravated Robbery of Mail, Money, or other Property of the United States, in violation of 18 U.S.C. § 2114(a). This offense constitutes a “crime of violence” under federal law. *United States v. Knight*, 936 F.3d 495, 501 (6th Cir. 2019) (“In sum, we conclude that the aggravated offense of 18 U.S.C. § 2114(a) is a crime of violence . . .”).

6. More specifically, evidence obtained by your Affiant, provided in detail below, indicates that Mahad S. Jama was responsible for the armed robbery of a United States Letter Carrier on April 4, 2023, to obtain a U.S. Postal Service Key. This robbery occurred near the 5500 block of Sawmill Road, Dublin, Ohio, within the Southern District of Ohio.

### **PROBABLE CAUSE**

#### **The Check-Stealing Scheme**

7. Law enforcement officers have been investigating a network of individuals involved in robbing or stealing USPS-issued Arrow keys from USPS employees in Central Ohio. The criminal actor(s) focus on stealing these Arrow keys, which open USPS collection boxes, for the purposes of stealing the mail located within.

8. The criminal actor(s) typically visit USPS collection boxes during the night/early morning. The criminal actor(s) then use the stolen Arrow keys and other methods to gain access to the USPS collection boxes, remove the mail, and then leave the area.

9. The criminal actor(s) generally take checks from the stolen mail, then alter those checks and deposit, or attempt to deposit, the counterfeit checks into various bank accounts. The criminal actor(s) often conceal the source of the money by transferring the fraudulently obtained money to other bank accounts. The criminal actor(s) then attempt to deplete the fraudulently obtained money via ATM withdrawals, peer-to-peer transactions, and/or the purchase of cryptocurrency. Generally, the initial actor who steals the Arrow key works with other individuals to accomplish the objectives outlined above.

April 4, 2023 Robbery Details

10. On or about April 4, 2023, at approximately 3:20 p.m., a USPS Letter Carrier was sitting in his delivery vehicle located at 5525 Sawmill Road, Dublin, Ohio, when an unknown suspect approached the USPS vehicle, brandished a handgun, and demanded the Letter Carrier's postal (Arrow) key. The Letter Carrier gave the unknown male his USPS Arrow Key, which was on a gold-colored metal chain.

11. Postal Inspectors and Columbus Police responded and canvassed the area. During the canvass of the area, multiple home and business surveillance videos were obtained. Law enforcement recovered surveillance videos which show the time period immediately preceding the robbery and surveillance video showing an unknown male fleeing while carrying what appears to be a gold-colored metal chain before ultimately getting into a white Subaru Forrester. The Subaru Forester was bearing Ohio license plate number JDW6207. This license plate is registered to Ebony May, 311 Benjamin Street, Delaware, Ohio.

Identification of Mahad Jama

12. On April 13, 2023 Postal Inspectors executed a federal search warrant at 5724 Datura Lane, Westerville, Ohio. Mahad S. Jama was located inside the residence during execution of that warrant. Jama was found to have checks in names other than his own on his person and inside the residence. Upon interviewing Jama, he admitted to having robbed the postal employee for his key on Sawmill Avenue on April 4, 2023. Jama stated that he conspired with Damon May to commit the robbery and said he gave the key to May immediately after the robbery. Jama further stated that Damon May currently has possession of the Arrow key at May's residence. Jama stated that May drives a Subaru which is registered in May's mother's name. The Subaru Forester observed at the robbery location bearing the Ohio license plate number JDW6207 is registered to Damon May's mother, Ebony.

**CONCLUSION**

13. Based upon the aforementioned information and events, and your affiant's training and experience in dealing with federal postal violations, your affiant believes that probable cause exists to believe that on or about April 4, 2023, Mahad S. Jama intentionally took mail matter, money, or other property of the United States (specifically, a USPS Arrow key) from the person or presence of a Letter Carrier who then had lawful charge, control, and custody of such property; that Jama took such property by means of force, violence, and intimidation; and that while committing the robbery, Jama put in jeopardy the life of that Letter Carrier by the use of a dangerous weapon, all within the Southern District of Ohio, in violation of Title 18, United States Code, Section 2114(a).

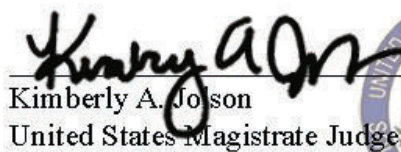
14. I therefore respectfully request that a criminal complaint and arrest warrant be issued for Mahad S. Jama.

Respectfully submitted,



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Mark V Massaro United States Postal  
Inspection Service



Kimberly A. Johnson  
United States Magistrate Judge

April 13, 2023

